

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE: )  
 )  
ERICA LATASHA ANDERSON, ) Bk. No. **17-04719-CW3-13**  
 ) Chapter 13  
Debtor(s). ) Judge Charles M. Walker

**THE DEADLINE FOR FILING A TIMELY RESPONSE IS:** August 26, 2020  
**IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE:** September 2, 2020 at 8:30 a.m.  
*via AT&T Conference Line using Call-In Number 1-888-363-4749 and Access Code 6926390#.*

TRUSTEE'S LIMITED OBJECTION TO DEBTOR'S  
MOTION TO MODIFY CHAPTER 13 PLAN

Henry E. Hildebrand, III, Standing Trustee for Chapter 13 matters in the Middle District of Tennessee, respectfully objects to the application filed by the debtor seeking to modify the plan as a result of the debtor's decline in income.

The Trustee has no objection to the debtor reducing payments in an effort to pay disposable income when the debtor's income has declined. The Trustee does, however, oppose shortening the commitment period to which the debtor agreed and proposed at the time of confirmation. The debtor has not provided any justification for a shortening of the plan. Thus, the Trustee does not oppose the debtor's proposal so long as the "base" would be established at \$36,300, a sixty (60) month plan.

Respectfully submitted,

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III  
Chapter 13 Trustee  
P. O. Box 340019  
Nashville, TN 37203-0019  
615-244-1101; Fax 615-242-3241  
[pleadings@ch13nsh.com](mailto:pleadings@ch13nsh.com)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certifies that on or before the 13<sup>th</sup> day of August, 2020, a true and correct copy of the foregoing has been served in the following manner:

***Email by Electronic Case Noticing to:***

U. S. Trustee  
Clark & Washington, Counsel for Debtor

***By U. S. Postal Service, postage prepaid to:***

Erica L. Anderson, 1510 Huntington Drive, Apt. B-1, Murfreesboro, TN 37130

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III  
Chapter 13 Trustee